

UNIVERSITY OF WEST FLORIDA

European Union General Data Protection Regulation (EU GDPR) Privacy Notice

Lawful Basis for Collecting and Processing of Personal Data

The University of West Florida (“UWF”) is a member institution of the State University System of Florida involved in education, research, and community outreach. In order for UWF to educate its students both in class and on-line, engage in world-class research, and provide community services, it is essential, necessary, and UWF has lawful bases to collect, process, use, and maintain data of its students, employees, applicants, research subjects, and others involved in its educational, research, and community programs. The lawful bases include, without limitation, admission, registration, delivery of classroom, on-line, and study abroad education, grades, communications, employment, applied research, development, program analysis for improvements, and records retention. Examples of the types of data that UWF may need to collect in connection with the lawful bases are: name, email address, IP address, physical address or other location identifier, photos, as well as some sensitive personal data obtained with prior consent.

For more information regarding the EU GDPR, please review the following resources: <https://www.eugdpr.org/>, and the UWF GDPR website: <https://www.uwf.edu/go/legal-and-consumer-info/general-data-protection-regulation-gdpr/>

In addition, UWF departments may have their own area specific EU GDPR-Compliant Privacy Notice posted on their website.

Most of UWF’s collection and processing of personal data will fall under the following categories:

1. Processing is necessary for the purposes of the legitimate interests pursued by UWF or third parties in providing education, employment, research and development, and community programs.
2. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. This lawful basis pertains primarily, but not exclusively to research contracts.
3. Processing is necessary for compliance with a legal obligation to which UWF is subject.
4. The data subject has given consent to the processing of his or her personal data for one or more specific purposes.

There will be some instances where the collection and processing of personal data will be pursuant to other lawful bases.

Types of Personal Data collected and why

UWF collects a variety of personal and sensitive data to meet one of its lawful bases, as referenced above. Most often the data is used for academic admissions, enrollment, educational programs, job hiring, provision of medical services, participation in research, development and community outreach. Data typically includes name, address, transcripts, work history, information for payroll, research subject information, medical and health information (for student health services, or travel), and donations. If you have specific questions regarding the collection and use of your personal data, please contact the Office of Compliance and Ethics at eugdpr@uwf.edu.

If a data subject refuses to provide personal data that is required by UWF in connection with one of UWF's lawful bases to collect such personal data, such refusal may make it impossible for UWF to provide education, employment, research or other requested services.

Where UWF gets Personal Data and Special Categories of Sensitive Personal Data

UWF receives personal data and special categories of sensitive personal data from multiple sources. Most often, UWF gets this data directly from the data subject or under the direction of the data subject who has provided it to a third party (for example, an application for admission to UWF through use of the Common App).

Individual Rights of the Data Subject under the EU GDPR

Individual data subjects covered by UWF's EU GDPR Privacy Notice will be afforded the following rights:

- information about the controller collecting the data
- the data protection officer contact information
- the purposes and legal basis/legitimate interests of the data collection/processing
- recipients of the personal data
- if UWF intends to transfer personal data to another country or international organization
- the period the personal data will be stored
- the existence of the right to access, rectify incorrect data or erase personal data, restrict or object to processing, and the right to data portability
- the existence of the right to withdraw consent at any time
- the right to lodge a complaint
- why the personal data are required, and possible consequences of the failure to provide the data
- the existence of automated decision-making, including profiling
- if the collected data are going to be further processed for a purpose other than that for which it was collected

Note: Exercising of these rights is a guarantee to be afforded a process and not the guarantee of an outcome.

Any data subject who wishes to exercise any of the above-mentioned rights may do so by filling such request with Matthew Packard, UWF EU GDPR Data Protection Officer, Office of Compliance and Ethics at eugdpr@uwf.edu.

Cookies

Cookies are files that many websites transfer to users' web browsers to enable the site to deliver personalized services or to provide persistent authentication. The information contained in a cookie typically includes information collected automatically by the web server and/or information provided voluntarily by the user. Our website uses persistent cookies in conjunction with a third party technology partner to analyze search engine usage and web traffic patterns. This information is used in the aggregate to monitor and enhance our web pages. It is not used to track the usage patterns of individual users.

Security of Personal Data subject to the EU GDPR

All personal data and special categories of sensitive personal data collected or processed by UWF must comply with the security controls, systems and process requirements and standards of [UWF Policy IT-04.01-03](#), *University of West Florida Information Security and Privacy Policy*.

We will not share your information with third parties except:

- as necessary to meet one of its lawful purposes, including but not limited to,
 - its legitimate interest,
 - contract compliance,
 - pursuant to consent provided by you,
 - as required by law;
- as necessary to protect UWF's interests;
- with service providers acting on our behalf who have agreed to protect the confidentiality of the data.

Florida Public Records Law

As a state university, UWF is subject to the provisions of the Florida Public Records Law, as outlined in Chapter 119, Florida Statutes. Except for those records that are exempt from disclosure under the public records law, Florida law provides that all citizens are entitled to view the records of state agencies on request and be allowed to make copies for a fee. For more

information on UWF's obligations under the Florida Public Records Law please see [UWF Policy GC-01.04-05/18](#).

Data Retention

Please be informed that:

1. The period for which your personal data will be stored will be from now until no longer needed for compliance with U.S. and Florida laws.
2. You can withdraw your consent, if granted, at any time and even only orally, but this will not affect the lawfulness of processing your personal data based on your consent before withdrawal.
3. You have legal rights and remedies against any breach of your personal privacy according to articles 77 to 84 of the EU GDPR.

UWF keeps the data it collects for the time periods specified in [UWF Policy FIN 03.02-02.14 Records Management](#), as required under Florida law.

****DISCLAIMER:** UWF may make amendments to this notice from time to time without prior notice by posting the revised notice to this site. The most recent version will be the last date in the History provided below.

History: August 28, 2018.